November 21, 2018

Mr. James Polek
Environmental Office, Wastewater Section
Enforcement Division
75 Hawthorne Street
Mailcode: ENF-3-1
San Francisco, CA 94105

Re: ENF-3-1, Clean Water Act Pretreatment Inspection, Pacific Choice Seafoods

Dear Mr. Polek,

The following information addresses the Areas of Concern that were identified during the Pretreatment inspection of the Pacific Choice Seafood operation in Eureka, CA on August 15, 2018.

Per your request, copies will be directed to both the City of Eureka and the North Coast Regional Water Quality Control Board.

Earlier this week I met with Mr. Ron Hensley, Plant Manager and Mr. David Bodiroga, Maintenance Manager where we reviewed the entire Inspection Report with emphasis on the corrective actions for the Areas of Concern. I will be referring to each of the Concerns, 1 – 12, in Section III of the Inspection Report in the following documentation.

I am sure we will be corresponding after your review of the information provided but if at any time you have questions for me, please do not hesitate to call at 707-442-2981, ext.: 8501 or e-mail at [HYPERLINK "mailto:rharris@pacseafood.com"].

Sincerely,

Rick Harris
General Manager, Pacific Choice Seafoods Company

Cc (w/enclosure by e-mail):
David Adams, City of Eureka
Cathleen Goodwin, N.C.R.W.Q.C.B.
Amber Little, Environmental Compliance Coordinator, Pacific Seafood Company

In response to Section III, Areas of Concern…Pacific Seafood, Eureka, CA August 15, 2018

1. Reference Photograph 5, leaking ozone pipe under dock.
   CORRECTIVE ACTION
   - As per inspection report, ozone pipe has been removed, photo e-mailed.
   - Photo enclosed. (Photo 1)

   TIMEFRAME: Complete

2. Reference Photographs 3 and 6, uncapped vertical pipes coming down under the dock.
   EXPLANATION OF THE PIPES

   These pipes were built into the three fish conveyor pits in the infeed room as part of the original construction of the City owned facility. They sit in the upper level of the incline of each pit. The intention of these pipes was to allow water to discharge in the event that the actual drain located in the bottom of the pit failed and the water would drain under the dock and keep the facility from flooding.

   CORRECTIVE ACTION
   - The pipes will be plugged from the top and filled with concrete to eliminate any chance of overflow and subsequent discharge into the bay.

   TIMEFRAME: November 23, 2018

3. Reference Photograph 7, PVC air vent
   CORRECTIVE ACTION
   - PVC pipe has been removed and capped
   - Photo enclosed (Photo 2)

   TIMEFRAME: Complete

4. Reference Photographs 10 and 11, shrimp de-shelling discharge
   EXPLANATION OF THE PROCESS

   Shrimp shell is pumped from the shrimp peeling area inside the facility and separated from the water used to pump into the hydro-sieve. The hydro-sieve allows the shell to travel into the awaiting dump truck or other receptacle while the water is sent to the Dissolved Air Floatation pre-treatment system. Residual water from the shell in the truck leaches out of the back of the truck and ultimately drains into the nearby storm drain that flows into the Bay. Subsequently, shrimp shell occasionally accompanies the water where it is screened out before continuing down the storm drain and into the Bay. This screen was installed under the advice of the City of Eureka a couple of years ago and was deemed as an acceptable method of preventing the shell from entering into the Bay. Pacific Choice understands that per the City of Eureka's Stormwater Ordinance only stormwater should be discharged to the storm drains, and will implement corrective actions to prevent the shrimp de-shelling discharge from entering the storm drain in the future.

   CORRECTIVE ACTION
   - Shrimp season ended in late September and will not begin until April 1, 2019

- Before April 1, 2019 we will install additional equipment, such as a tank, in the loading area to capture the residual shrimp de-shelling water and send it into the on-site pre-treatment facility.

TIMEFRAME: Before April 1, 2019

5. Reference Photograph 15, 16 and 17 oyster washing, fish unloading, live crab

EXPLANATION OF THE PROCESSES

Oyster are harvested daily from the permitted grounds in Humboldt Bay then barged to the plant in large totes where they are then separated from clusters into single/individual oysters for sale in the live whole state. Prior to packing the oyster for sale they are sent through a wash conveyor to remove the residual bay mud. The bay mud washes over the side of the dock and back into the bay. Common industry practice coast wide.

Fish is unloaded from the boats and sent through a de-icer containing water from the bay. The ice and fish are separated in the process allowing the fish to be gathered into large totes and weighed for purchase from the fishing vessel. In the process, bay water from the unloading overflows and returns back into the bay. Common industry practice coast wide.

Live Crab, though not operating at the time, is offloaded from the boats and held in large totes of bay water to keep the crab alive. The overflowing water washes out of the totes and returns back into the bay. Common industry practice coast wide.

CORRECTIVE ACTION

- On the recommendation of Cathleen Goodwin from the North Coast Regional Water Quality Control Board, we are gathering information on the Low Threat Discharges to Surface Water in the North Coast Region NPDES permit. Conversation has been initiated with the Water Board to determine what our permitting options are. We are also weighing the technical limitations of our current system.

TIMEFRAME: Awaiting guidance from North Coast Regional Water Quality Control Board

6. Reference Photograph 20, roof drains

EXPLANATION OF PROCESS

Per the building plans of the City owned facility, the three identified pipes discharge rainwater from the roof of the building directly into the bay as the pipes pass through the dock and stop flush at the bottom of the concrete slab. The remaining downspouts look to flow into the storm drains that flow into the bay on the north and south sides of the plant and not into the sanitary sewer system.

CORRECTIVE ACTION

- Identified the draining process per Number 6, Area of Concern.

TIMEFRAME: Complete

7. Reference Photograph 22 and 23, shrimp process water
   CORRECTIVE ACTION
   - Prior to April 1, 2019 shrimp season, 100% of shrimp, crab, fish and oyster processing water inside the building will run through on-site pre-treatment DAF system before discharging into City sewer system.

   TIMEFRAME: April 1, 2019

8. Crab processing remodel.
   EXPLANATION OF PROCESS
   - The City of Eureka is aware of the permitted process taking place to replace old existing equipment and processing practices with new updated equipment and practices. There is no substantial change in volume or character of pollutants discharged in the process.

   TIMEFRAME: Complete

9. Reference Photographs 26 – 28, secondary chemical containment
   CORRECTIVE ACTION
   - Outside secondary containment cabin now only houses unopen plastic barrels.
   - Inside sanitation chemicals all reside on secondary containment receptacles.
   - Photos enclosed (Photos 3, 4, 5 and 6)

   TIMEFRAME: Complete

10. Please refer to #9. (Covers both 9 & 10)

11. Reference Photograph 30 and 31, storage of compressor oil
    CORRECTIVE ACTION: Please see below correspondence confirming corrective action.
    - **From:** David Bodiroga [[HYPERLINK "mailto:DBodiroga@pacseafood.com"]]
      Sent: Tuesday, October 30, 2018 1:27 PM
      To: Snodgrass, Kimberly <[HYPERLINK "mailto:KIMBERLY.SNODGRASS@SAFETY-KLEEN.COM"]>
      Subject: RE: oil pick up

      Thank you.

      From: Snodgrass, Kimberly [[HYPERLINK "mailto:KIMBERLY.SNODGRASS@SAFETY-KLEEN.COM"]]
      Sent: Tuesday, October 30, 2018 1:22 PM
      To: David Bodiroga <[HYPERLINK "mailto:DBodiroga@pacseafood.com"]>
      Subject: RE: oil pick up

      We will be back week 48- November 26-30th.
      We usually come up on a Tuesday or Wednesday.

Kim

- The above is e-mail correspondence between Pacific Choice and Safety Kleen for pick up and removal of all stored oil putting us in compliance with Local, State and Federal Law.

TIMEFRAME: November 30, 2018

12. Reference Photograph 35, process wastewater from shrimp to storm drain.

EXPLANATION OF PROCESS

Full totes of shell and fish carcasses are stored awaiting pick up from a couple of different users of our by-products for fertilizer. On occasion, a tote will leak and discharge a minimal amount of process water into the storm drain.

CORRECTIVE ACTION

- All totes will be checked for leaks and sealed prior for use of storing byproducts

TIMEFRAME: 11/30/2018

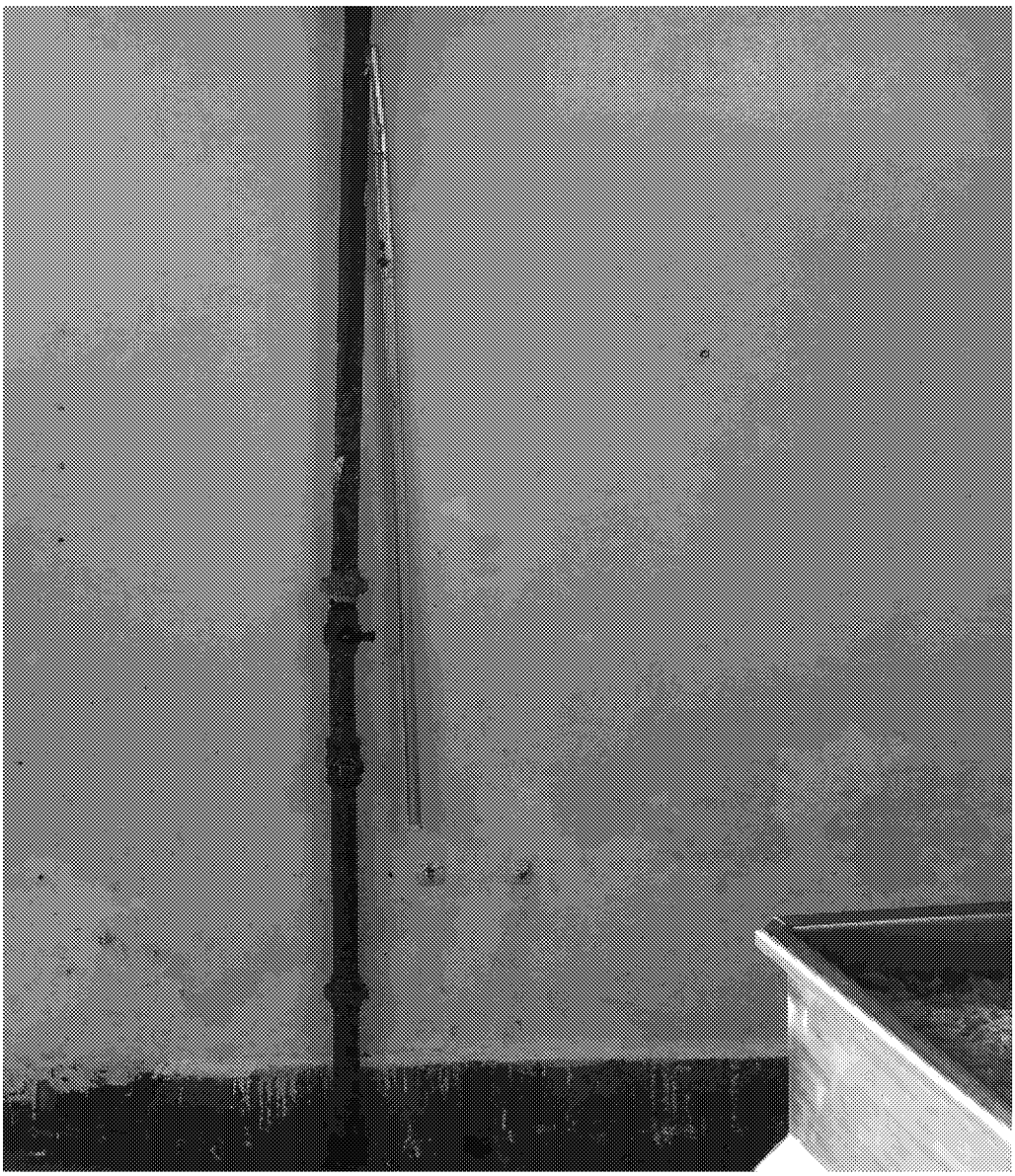
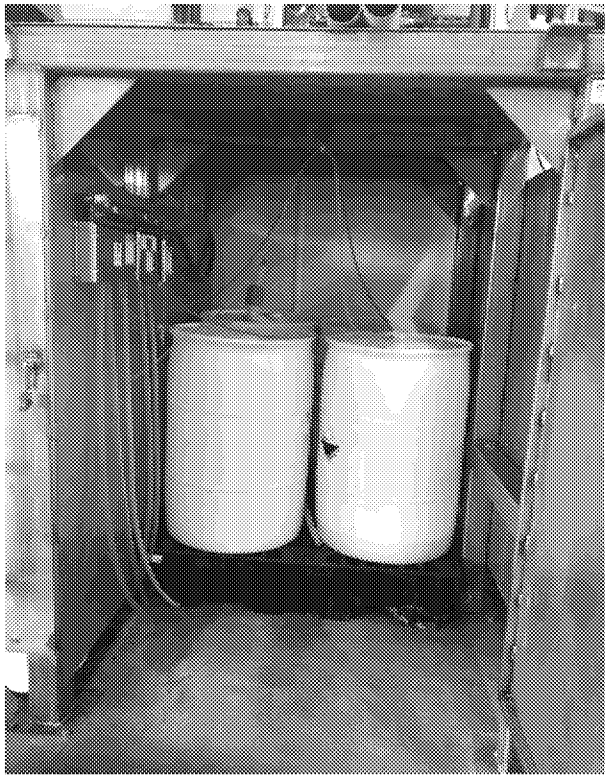


Photo 1…Removed Ozone Pipe

Photo 2…Ventilation Pipe removed and cap.



Photos 3 and 4 Inside Chemical storage and containment

Photos 5 and 6…Outside chemical storage and containment.